

CONTINUATION IN SUPPORT OF A CRIMINAL COMPLAINT

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since September 20, 2015. As part of my duties, I am assigned to the Detroit Division, Grand Rapids Resident Agency. As part of my duties, I have investigated federal criminal violations involving firearms, possession of explosives, bomb threats, and threats of violence communicated over the phone and through the use of the internet, as well as threats of violence intended to intimidate or coerce. I have also been involved with investigations concerning child exploitation offenses, to include violations of 18 U.S.C. § 2251, which prohibits the sexual exploitation of children, as well as attempt and conspiracy to commit the same. As a federal agent, I am authorized to investigate violations of laws of the United States, and as a law enforcement officer I am authorized to execute warrants issued under the authority of the United States

2. I make this Continuation in support of an Application for an Arrest Warrant for MARTELL SCOTT-WARE. (MARTELL SCOTT-WARE also goes by MARTELL SCOTT, and will hereafter be referred to as "SCOTT.") Based on the facts described in greater detail below, I submit there is probable cause that SCOTT has violated 18 U.S.C. § 2251(a).

3. I am advised by the United States Attorney's Office for the Western District of Michigan that evidence must establish probable cause of the following elements in order to establish probable cause of that a violation of 18 U.S.C. § 2251(a) has been committed:

First: Defendant used a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct; and

Second: At least one of the following:

- i. Defendant knew or had reason to know that the visual depiction would be transmitted using any means or facility of interstate commerce;
- ii. The visual depiction was produced or transmitted using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including computer; or
- iii. The visual depiction was transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

4. The statements contained in this Continuation are based upon information acquired during a multi-agency investigation, as well as information provided by others such as other police officers, and Task Force Officers (TFOs) and Special Agents of the FBI. Because this Continuation is being submitted for the limited purpose of establishing probable cause to secure a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts I believe necessary to establish probable cause to believe that there is evidence of criminal activity in violation of 18 U.S.C. § 2251, which prohibits the sexual exploitation and attempted sexual exploitation of children.

PROBABLE CAUSE FOR SEARCH WARRANT

Police in Arkansas Find Two Trafficking Victims

5. Around April 29, 2024, law enforcement from the Clark County Sheriff's Department in Arkansas made contact with a 22-year-old female, SHAUNTELLE BLACKMON and a 16-year-old female (MV1) in Clark County, Arkansas, outside of a local hotel. (The 16-year-old had turned 16 that day, and was 15-years old for the duration

of the illicit conduct described later in this affidavit.) Both females were from Western Michigan. Officials interviewed BLACKMON and MV1 in separate interviews.

6. At first, MV1 denied participating in commercial sexual activity. However, she later admitted that she actually *had* participated in commercial sexual activity in both Michigan and Arkansas during 2024.

7. A search warrant was obtained for MV1's phone and a forensic data acquisition for the phone was conducted on the device.

8. Separately, the FBI found advertisements on skipthegames.com which featured images that appeared to be MV1. The advertisement posts were made under the name "Alicia" and "Rose". On 6/17/2024, a request was made to skipthegames.com for subscriber information for the user who posted the ads of MV1. Skipthegames.com responded with the following user information:

- a. Email: shauntelleashonti@gmail.com
- b. Sign up: Aug 16 2020
- c. Phone: 231-852-4050 (known number of BLACKMON).

9. Between the dates 3/18/2024 and 4/28/2024, the user of the skipthegames account posted sex ads with URLs that contained the names: Diamond, Monica, Alicia, and Rose. These ads were posted in the following locations: Grand Rapids, Muskegon, Kalamazoo, and Holland. The majority of the ads were located in Grand Rapids.

10. A sex ad was found on skipthegames.com which was posted on 4/15/2024, with the title "NEW GIRL ALICIA!!!! TIGHT WET AND READY TO PLAY". The listed phone

number was 231-852-4050 (known number of BLACKMON). Three photos were attached to the ad which depicted photos of MV1 in underwear from behind.

11. Between 4/24/2024 and 4/28/2024, the ad locations were all in Little Rock, Arkansas and the ad URLs contained the names Diamond and Rose.

Conversations Found on Blackmon and MV1's Phone

12. The extractions from MV1's phone and BLACKMON's phone were reviewed by law enforcement. For an unknown reason, the extraction of BLACKMON's phone did not extract the photos and videos sent in the text messages, although the text messages show files were sent. Below are portions of conversations found from both phones:

13. Around 4/15/2024, MV1 and BLACKMON had this exchange (MV1's phone):

- a. MV1 told BLACKMON "We pulling in rn He asked how old I was I told him 17 finna be 18 in a couple days I think I fcked up". BLACKMON instructed MV1 to tell anyone who asked her age that she was 23. MV1 told BLACKMON than when they were walking up the stairs, the guy they were with grabbed her buttocks. BLACKMON told her "just play yo role for the \$\$\$!"

14. BLACKMON'S device included conversations with a person she referred to as "Scottie", later identified as MARTELL SCOTT-WARE [SCOTT]. Around 4/15/2024, it appeared SCOTT got BLACKMON a hotel room and told her to check in. When BLACKMON asked whose name the room was under, SCOTT said it was under his

name, "Martell Scott".

15. Around 4/15/2024, BLACKMON and MARTELL SCOTT had this exchange (Blackmon's phone):

- a. BLACKMON and SCOTT began a text conversation. SCOTT instructed BLACKMON to create an OnlyFans account and said he could get hotel rooms half off. SCOTT told BLACKMON to show him her skipthegames account so he could see if it needed to be more creative. SCOTT said "Ima be on yo ass ima make sure u make some money u know some people who do coke?" and BLACKMON replied, "I do it sometimes 🙄🙄 I need a lil waker upper". Later, it appeared SCOTT provided drugs to BLACKMON and MV1 after BLACKMON told SCOTT she was sleepy. SCOTT said that "We got it its down the st doe come on". After approximately 1.5 hours had passed, the following conversation was had:

Blackmon: This shit 🙄

Scott: Always is thanks

Scott: She do it too

Blackmon: Yea don't tell her I told u

Blackmon: Yea I don't do it frfr just to stay up and active

Scott: I wouldn't do that

Scott: Ysll can trust me

- b. SCOTT asked about BLACKMON's sister and if it was her real sister, and

BLACKMON said it was. SCOTT then said “I got chu for sure shit i got both of yall” and told BLACKMON he was getting her a hotel room. Later, BLACKMON told SCOTT that she would pay him to look out for them once they got busy, and SCOTT replied “I got yall i told u this”.

- c. SCOTT told BLACKMON “im just saying u said he be on ba so just wanna make everybody comfortable and yeah ima take some good pics of u too”. SCOTT later asked BLACKMON for pictures of them, “You gotta send me pics of yall too bae cause i got people that spend and i got people who know people but they be wanna see dont gotta be nasty pics just real nice ones mouth drooling pics”. BLACKMON sent SCOTT 7 images, however they were not recovered in the extraction of BLACKMON’s device.

16. Around 4/15/2024, BLACKMON and MARTELL SCOTT had this exchange (BLACKMON’s Phone):

- a. BLACKMON told SCOTT that she was about to bring “her” [MV1] to a sex date. She told SCOTT that it had been slow so they were trying to do whatever sex dates they could get. SCOTT responded “...yeah grab everything its gone speed up soon i promise ima help u get it going even if we gotta promote a lil bit we need to make a private snap”. BLACKMON later said she was waiting for MV1 to finish her sex date because BLACKMON had a sex date waiting on her at the hotel.

17. Around 4/15/2024, MV1 and BLACKMON had this exchange (MV1’s Phone):

a. It appeared BLACKMON was coaching MV1 through a sex date:

Blackmon: I'm right here I got u promise

MV1: getting off the elevator

Blackmon: Don't do nothing without the money first

Blackmon: No longer than 20 mins

MV1: Ok

MV1: Ofc

Blackmon: Lmk

MV1: At the room now

Blackmon: Ok he's legit?

MV1: I'm at his door now

Blackmon: Tell him u got ur sister outside if he asks why ur texting

b. A few messages later:

MV1: I'm ready

MV1: I'm finna come down

Blackmon: Ok I'm by the door

Blackmon: I was about to walk in

Blackmon: U good??

MV1: Yeah

Blackmon: Come on way

MV1: In the elevator

Blackmon: Ok u got the money and everything

MV1: Yeah

Blackmon: I got someone waiting on me

MV1: ok

18. Around 4/16/2024, BLACKMON and SCOTT had the following exchange (Blackmon's Phone):

- a. SCOTT told BLACKMON that he had a sex date set up for MV1, but it did not appear that the date occurred.

19. Around 4/16/2024, BLACKMON and SCOTT had the following exchange (Blackmon's Phone):

- a. SCOTT asked BLACKMON, "yall ever had a 3sum i mean i seen yall do a bj together but yeah". BLACKMON told SCOTT that they haven't had a threesome together yet. During this conversation SCOTT told BLACKMON that he had set up a sex date for BLACKMON, for \$100 for a quick visit. He then told her "You make sure u do your shit he trick heavy". It appeared that the sex date occurred based on the text messages.

20. Around 4/16/2024, BLACKMON and SCOTT had this exchange (Blackmon's Phone):

- a. SCOTT told BLACKMON that he was going to pay for BLACKMON and MV1 to get their nails done. BLACKMON told SCOTT that he didn't need

to pay for MV1, and the following conversation was had:

Blackmon: She can pay for her own, your friendly ass!

Scott: How im friendly we a team lol

Blackmon: Yeah true

Blackmon: Ig

Scott: Dont be acting like that ma you know you the bottom bitch ☐☐👉👎☐👎

Blackmon: bottom huh?

Blackmon: 🤔

Scott: My bottom bitch they one who running shit the mf thats in charge the one i trust with any and everything

21. Around 4/17/2024, BLACKMON, SCOTT, and MV1 had a group text conversation together and had the following exchange (Blackmon's Phone):

- a. MV1 sent the message "We're here park down the road" and SCOTT responded "I know bet on my way i aint far". The next message he sent was approximately 45 minutes later and was "I went to the kitchen babies had to go cook up i was running low on hard".

- i. Based on my training and experience, I know the term "hard" can refer to illegal drugs, such as cocaine.

22. Around 4/17/2024, BLACKMON and SCOTT had the following exchange (Blackmon's Phone):

- a. SCOTT appeared to be talking to BLACKMON about having a threesome

with MV1. BLACKMON appeared to be hesitant:

Blackmon: I'm sick I ain't enough 🤔🤔

Blackmon: But ok I'll see wassup if that's what u want

Scott: You is momma dont say that u see i treat yall equal dont even think ima let up off you regardless

b. A few messages later:

Blackmon: I don't like sharing cause I'll treat u with the upmost respect

Scott: I feel like we gone be sharing you

c. Later on around the same day, SCOTT and BLACKMON discussed BLACKMON and MV1's sex ads:

Blackmon: I'm okay yeah she taking a shower rn

Blackmon: Tryana get some money some how

Scott: Post more than one ad if thats already done make sure both of yall on both ads take some more pics bae

Scott: Did u check to see if u got verified on listcrawler

Blackmon: Ok we plan on taking more pics and get them ☐

d. Later, BLACKMON told SCOTT that they were taking pictures and sent SCOTT several images, however, the images were not recovered in the phone extraction. SCOTT sent the following messages: "Lmaoo we really gone be rich asf in a min yall aint gotta worry when u get off yo p we recording everything fucking outta state on balconys public fitting rooms

role play all that” “ Yall gone have to get comfortable with yall girl on girl”.

23. Around 4/18/2024, BLACKMON and MV1 had the following exchange (MV1’s phone):

- a. BLACKMON told MV1 that “Yeah I mean not rn be he wanna fw us and I ain’t doing that We here to make money” and that “he” wanted to take MV1 to the clubs. MV1 said she didn’t want to go to the clubs with him. BLACKMON then instructed MV1 to set up a phone number so they could make money:

Blackmon: Okay so set that number up and give it to me like I been telling you

Blackmon: Let’s get money

MV1: Ok

MV1: 616-321-3194

Blackmon: If he text you, you better tell me

MV1: Ok yk I will

24. Around 4/18/2024, SCOTT and MV1 had the following exchange (MV1’s phone):

- a. MV1 began texting SCOTT and immediately started sharing her location with SCOTT. SCOTT said he was “pulling up”.

25. Around 4/18/2024, BLACKMON and MV1 had the following exchange (MV1’s phone):

- a. BLACKMON appeared to be coaching MV1 on how to text with people

responding to her sex ads. MV1 appeared to be talking to a “john” and texting BLACKMON questions about to how to respond to his questions. MV1 ASKED WHAT “Girlfriend experience” meant and said, “he said is there a up charge”. BLACKMON instructed her to ask him how long he wanted to come for and told her how much to charge. BLACKMON told MV1 to tell the john “Tell him he will have fun with you and enjoy his time” and to get a picture of the cash from him. BLACKMON then said she had a date for them both. MV1 asked BLACKMON if they needed condoms. Later, MV1 asked BLACKMON “What we doing at this play?” and BLACKMON told her “Basically what we did in the video”. A few hours later, MV1 sent the message “We could prolyl catch another play” and BLACKMON responded “I’m finna post”.

26. Around 4/19/2024, SCOTT and MV1 had the following exchange (MV1’s phone):

- a. MV1 and SCOTT were messaging and it appeared that MV1, BLACKMON, and SCOTT had been together as he asked MV1 what she wanted to eat.

27. Around 4/20/2024, BLACKMON and MV1 had the following exchange (MV1’s phone):

- a. BLACKMON texted MV1 and told her to wake up because she had a sex date for \$150. When MV1 didn’t respond, BLACKMON threatened to take her back home.

28. Around 4/21/2024, BLACKMON and MV1 had the following exchange (MV1's phone):

- a. BLACKMON told MV1 that she posted them both and that "He pmo fr".
- b. BLACKMON told MV1 that they needed money. BLACKMON told MV1 to text people "Text them #'s "I'm available for Incall appointments"".

When MV1 asked BLACKMON how old to say she was, BLACKMON told her to say 20.

29. Around 4/21/2024, BLACKMON and MV1 had the following exchange (MV1's phone):

- a. BLACKMON sent the following messages:

Blackmon: Nah Fr I know sis first quarter and he's bringing that side out so let's jus see where it goes but as far as all this stuff I got u

Blackmon: I told him we doing a video me and u 1 on 1 rn

Blackmon: But yk whatever happens happens but we need to make some money fr

- b. MV1 told BLACKMON she wanted to do it when she was drunk and horny. BLACKMON and MV1 discussed having sex with each other. BLACKMON then said "Videos gotta hit different" and a few messages later, "I hope you do what I asked or I'm gone real life Micheal myers yo ass".

- i. Note: I am aware from my experience that Michael Myers is the ultra-violent, recurring villain in the Halloween movie franchise.

30. Around 4/21/2024, BLACKMON and SCOTT had the following exchange (Blackmon's Phone):

- a. BLACKMON sent SCOTT several text messages indicating that she was going to record sexual videos with MV1:

Blackmon: We finna make the lesbian shit once we get back

Blackmon: Stop playing it crazy

Scott: Just woke up and yeah we been off track dont get me wrong i do like you but it damn near feel like we finna get married or something we suppose to be building these pages catching these plays and multiple nothing wrong with neither one of yall we just getting side track

Blackmon: Ok babe I got it together Lastnight had to talk to her about some that's a reason I wanted to be alone with her too

Blackmon: keep it business with HER is all I had to get clear so shit don't get misconstrued and I just had done some like this somewhat before and it didn't end well I like you too and I don't have to be sidetracked I gotta be making Pape everyday and I apologize for making shit awkward for you

Scott: Yeah but it was also needed in order for us to all be comfortable and build a bond its business regardless but mf gotta have some type of feelings for eachother to make something like this work once one person feels left out excluding them or anything can make them find other options put yourself in that position everybody gotta play they role

Blackmon: Ok

Blackmon: !!

Blackmon: Sayless let me jus fall in line

31. Around 4/21/2024, MV1 and SCOTT had the following exchange (MV1's Phone):

- a. MV asked SCOTT "What's wrong" and SCOTT replied "Shit just

awkward now supposed to be getting money and having fun starting to feel like a full blown relationship". The following conversation was had after MV1 asked SCOTT what he said to her:

Scott: I mean I told her we gotta get on tha content shit and girl on girl thinking she was gone say yea but I guess she said she got another girl

MV1: Ohh

MV1: That's weird

Scott: Exactly that why im lost like damn why tf she keep tryna disqualify u

32. Around 4/21/2024, BLACKMON and contact RAYELYN had the following exchange (Blackmon's Phone):

a. BLACKMON told RAYELYN that she was trying to "get some money".

RAYELYN asked if MV1 was with her, and BLACKMON said yes.

33. Around 4/21-22/2024, BLACKMON and SCOTT had this exchange (Blackmon's Phone):

a. BLACKMON told SCOTT, "Let's fuck her later" and several messages later, "We finna slide on u bae". BLACKMON told SCOTT that MV1 was attracted to her and liked SCOTT. When SCOTT said he was confused about who BLACKMON was talking about, BLACKMON sent SCOTT MV1's name to clarify. SCOTT then said "Should be pulling 20k plus w month off onlyfans we do it right".

b. It appeared BLACKMON, SCOTT, and MV1 produced pornographic

videos together that evening based on the following messages:

Blackmon: We gonna do some shower videos (4/21/2024 10:54:35 PM(UTC-5))

Blackmon: With the vibrator and she wanna do 1 on 1 rn

Scott: Wait to late night for that i think my mom still up ill lyk when

Scott: If yall wanna do 1 on 1 rn yall can

Scott: Im finna see whats to a room

Blackmon: She is she on the phone I know I'm talking letting her open up I got this watch it flow

Scott: Yeah dont rush it we good we chilling

Blackmon: She Onnat wit me lol I'm just tryana make her comfortable get some videos started

Blackmon: I'm doing what you asked babe

Blackmon: 

Scott: Loved "She Onnat wit me lol I'm just tryana make her comf..."

Scott: Yeah i see that good job ma

Blackmon: For you

Scott: Loved "For you "

Scott: U gotta stay on her ger her ass open

Blackmon: Liked "U gotta stay on her ger her ass open"

Blackmon: Babe bring us some towels ?

Blackmon: And the bottle

Blackmon: And that snow 

Blackmon: 😊😊nvm

Blackmon: Come on the shower bae (4/22/2024 12:16:50 AM(UTC-5))

Blackmon: Rinsing off (4/22/2024 1:53:20 AM(UTC-5))

Blackmon: Send me the videos asap (4/22/2024 1:53:25 AM(UTC-5))

c. SCOTT then sent BLACKMON 14 video files, however, the videos were

not recovered in the extraction. The file names were: IMG_0104.MOV,

IMG_0098.MOV, IMG_0097.MOV, IMG_0106.MOV, IMG_0099.MOV,

IMG_0111.MOV, IMG_0112.MOV, IMG_1114.MOV, IMG_1115.MOV,

IMG_1118.MOV, IMG_1116.MOV, IMG_1117.MOV, IMG_0817.MOV,

IMG_0116.MOV.

d. Later, SCOTT and BLACKMON had the following conversation regarding

the sex they had with MV1 and BLACKMON doing sex dates:

Scott: Lmaoo bro chill u beed to learn how to control yoself stop taking everything to heart we at business in order to get rich we gotta be open minded

Blackmon: I know babe I am chillen first and for most u not gone disregard my emotions idgaf I don't do that to you & many ways to get rich and the right way to do it is make sure mfs know they place that's all love

Blackmon: Very open minded I never had a 3 some or sold my ass before a few weeks ago , so u can't tell me I'm not all in with u.

e. BLACKMON then asked about what she should charge for the videos:

Blackmon: What should I charge for these videos throw me a

price

Scott: 20 for videos 10 for pics 40 ft

Blackmon: Disliked “20 for videos 10 for pics 40 ft”

Blackmon: 30 for videos 40 single ft. & 60 duo ft

Blackmon: 10-15 pics

Scott: U gotta build yo shit first den go up

34. Around 4/22/2024, MV1 and SCOTT had the following exchange (MV1’s Phone):

- a. MV1 asked SCOTT to send her the video clips he had. She said she would ask BLACKMON for the other ones. SCOTT then sent MV1 12 videos depicting MV1 and BLACKMON engaging in oral sex and vaginal sex with an adult black male. One of the videos depicted BLACKMON performing oral sex on MV1 while someone else recorded it. In some of the videos the male was holding the camera and recording, and some of them appear to be recorded while BLACKMON was holding the camera. The video file names were: IMG_0104.MOV, IMG_0098.MOV, IMG_0097.MOV, IMG_0099.MOV, IMG_0112.MOV, IMG_1114.MOV, IMG_1115.MOV, IMG_1118.MOV, IMG_1116.MOV, IMG_1117.MOV, IMG_0817.MOV, IMG_0110.MOV. The first 11 videos listed had file names that matched the file names of the movies SCOTT sent to BLACKMON.

- i. The EXIF data was compared to several of the files with identical names, found in chat messages on each phone, and

both sets of files were created with an Apple iPhone 11 phone running software version 17.4.1.

Investigators Find the Videos of MV1 on SCOTT'S Phone, and SCOTT Identifies Himself in the Videos

35. On April 24, 2025, agents of the FBI and law enforcement partners executed multiple federal search warrants at the home of SCOTT, located at 947 Ballard St SE, Grand Rapids, Michigan.¹ Among other evidence that was recover, agents secured an iPhone 14 that belonged to SCOTT. A warrant issued in case number 1:25-MJ-212 authorized the seizure of this device and a search of its contents.

36. SCOTT was taken into custody. He waived his *Miranda* rights and agreed to speak with interviewers during a custodial interview. During the subsequent conversation, he told his interviewers the passcode to his iPhone 14, which the interviewers then used to unlock the device.

37. The interviewers found the videos featuring MV1 saved on the device. SCOTT admitted that he was the male engaging in sexual activity with MV1 in the videos. He admitted to recording the videos himself. He acknowledged that the videos were recorded at his home, which is located in Kent County, Michigan.

¹ The warrant issued in case number 1:25-MJ-221 authorized a search of SCOTT's home for the Apple iPhone 14 Pro Max assigned IMEI: 35805791803103. While executing this warrant, investigators observed drug trafficking evidence in plain view. They then sought and obtained a subsequent warrant in case number 1:25-MJ-223 that permitted law enforcement officials to expand the scope of their search to include evidence of violations of 21 U.S.C. § 841(a), which prohibits possession with intent to distribute controlled substances and distribution of the same.

Information Concerning Interstate Commerce

38. I know from my training and experience that Apple does not manufacture any iPhones in the State of Michigan.

- a. For this reason, recording a video in Michigan using an iPhone involves the use of materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce.

39. I know from my training and experience that uploading a pornographic video to the internet for the purpose of distributing that video to paying subscribers would inherently involve the use of a means and facility of interstate commerce, specifically, a cellular communications network and/or a wireless or wired connection to the network of an internet service provider.

- a. Consequently, a person who creates visual depictions of sexually explicit conduct with the goal of later distributing those depictions to paying subscribers over the internet had, at the time the visual depictions were created, reason to know that the visual depiction would be transmitted using a means or facility of interstate commerce.
- b. For the same reasons, a person in Michigan who transmits visual depiction of sexually explicit conduct to a person located in Arkansas has actually transmitted those visual depictions using a means or facility of interstate commerce.

CONCLUSION

40. Based upon the above information, I respectfully submit there is probable cause that MARTELL SCOTT-WARE committed the offense of sexual exploitation of a minor contrary to 18 U.S.C. § 2251.

41. Wherefore, by this Continuation and Application, I respectfully request that the Court issue an Arrest Warrant for MARTELL SCOTT-WARE.